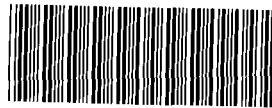


United States Government



Department of Energy

# memorandum

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REPLY TO  
ATTN OF:

EM-453 (J. Ciocco, 3-7459)

SUBJECT:

Operable Unit 1 RCRA Facility Investigation/Remedial Investigation  
Environmental Evaluation Field Sampling Plan

TO: Frazer Lockhart, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats Branch, has reviewed the above-referenced document and is providing the attached comments.

Please address these comments before the document is finalized.

Please call Jeff Ciocco at 301-903-7459 if you have any questions related to this request.

Autar Rampertaap  
Chief  
Rocky Flats Branch  
Rocky Flats/Albuquerque Production Division  
Office of Southwestern Area Programs

Attachment

cc w/o attachment:  
R. Greenberg, EM-453  
J. Hartman, RF

15181

MHS  
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A-DU01-000803

EM-453 COMMENTS ON: PHASE III RCRA FACILITY INVESTIGATION  
REMEDIAL INVESTIGATION OPERABLE UNIT 1, 881 HILLSIDE  
ENVIRONMENTAL EVALUATION  
FIELD SAMPLING PLAN, ROCKY FLATS PLANT

GENERAL COMMENTS:

1. The Final Phase III RFI/RI Environmental Evaluation Work Plan for the 881 Hillside (Operable Unit No.1) was published in June 1991. This Work Plan includes a Field Sampling Plan (FSP) for the Environmental Evaluation (EE). The current document is identified as a Draft Final revision of the FSP. Altering the final version of a Work Plan is inconsistent with the normal progression or sequence of document development in the CERCLA/RCRA process. It is questionable if wholesale substitution of the FSP will be acceptable to the regulatory agencies. A more appropriate alternative would be to retitle the new document as a *Revision to the Environmental Evaluation Field Sampling Plan*. The status of the new document could then be considered as a Draft Final version.
2. The historical development of the EE process at Rocky Flats Plant (RFP) should be included in the introduction. The text should indicate that the EE represents a relatively recent attempt by the Department of Energy (DOE) to include consideration of the ecological risk associated with past operations at RFP. Environmental Evaluations were not developed for the Phase I or II Work Plans. Lack of preliminary ecological information should be used as a justification of the extensive biological surveys proposed in this Work Plan.

The number of biological samples required to support statistical analyses is also due to a lack of preliminary information from the earlier phases of the Remedial Facility Investigation/Remedial Investigation (RFI/RI) of Operable Unit 1 (OU1). Without an indication of variability associated with the sampling techniques, the experimental and statistical designs can be considered highly speculative. The basis for selection of the sampling techniques and sample size and number should be presented in the text.

3. The concepts of Quality Assurance and Quality Control are not correctly represented in the FSP. Unless these concepts are properly discussed, it is recommended that they be deleted.
4. The discussion of Data Quality Objectives (DQOs) for the FSP elements is unclear. The text reads as if DQOs represented an after thought in development of the FSP. It is recommended that the DQOs be rewritten in a style more consistent with the other chapters of the OU1 RFI/RI Work Plan.
5. The document contains a number of statements spliced into the text that are out of context or appear to be after thoughts. An example can be found in the second paragraph of Section 2.1.1 (page 12) that states that a general objective of the EE "collects data and develops criteria to be considered to ensure that remediation of OU1 is protective of the

environment". Concern for the possible consequences of remedial actions is an issue to be considered in the Feasibility Study of the process. This objective appears only once in the document. It is recommended that the document be edited to remove these inconsistencies.

6. The discussion of Sample Design does not indicate how the qualitative information will be employed to develop the various models proposed for OUI. The relationship between qualitative and quantitative information in the Sample Designs is not clear, especially as they relate to the ten tasks defined in the EE Work Plan.